

<u>Guidance for Adding Robust Voter Registration Services</u> to Federally-Facilitated Health Insurance Exchanges

As an agency, HHS can play a leading role in the success of President Biden's March 7th Executive Order Promoting Access to Voting¹ through the addition of robust voter registration services to the Federally-Facilitated Health Insurance Exchanges' ("FFEs") ² processes, including within the benefits applications on Healthcare.gov and with the services provided by call center staff and Navigators. Doing so will bring voter registration opportunities to an enormous pool of people: More than 10 million customers submitted applications through FFEs during the 2020 open enrollment period.

Section 1 of this document makes recommendations to Health and Human Services ("HHS") and Center for Medicare & Medicaid Service ("CMS") about incorporating robust voter registration services into the FFEs. Most state operated health insurance exchanges have implemented NVRA-compliant voter registration services, and the recommendations below rely upon both the requirements of the National Voter Registration Act ("NVRA")³ as well as the state practices as a model. Most of the state operated exchanges integrated voter registration services after the initial launch of their health benefit exchanges, without interrupting or in any way interfering with exchange operations. ⁴ There is every reason to expect the FFEs can do so as well.

Section 2 of this document describes additional policy benefits to adopting the best practices described in Section 1.

Section 1. Best Practices for Integrating Voter Registration into FFEs

To offer robust voter registration opportunities, FFEs should take these 3 key steps:

- I. ask customers in writing whether they would like to register to vote or update their voter registration address and, as part of that offer, *inform* them that registering to vote is their choice, can be done in private, and their decision will be kept confidential.
- II. distribute a voter registration application form in a manner that all customers can access.
- III. assist customers to complete the voter registration application form.

¹ March 7, 2021 Executive Order on Promoting Access to Voting, available at https://www.whitehouse.gov/briefing-room/presidential-actions/2021/03/07/executive-order-on-promoting-access-to-voting/.

² Exchanges are governed by Sections 1311 to 1321 of the ACA, codified as 42 U.S.C. §§ 18031-18041.

³ 52 U.S.C. § 20506.

⁴ See, e.g., "California to Comply with Voter Registration Law According to Settlement", available at https://www.aclunc.org/news/california-comply-voter-registration-law-according-settlement.

I. Ask and Inform about Voter Registration:

A question about voter registration should be integrated directly into the initial or renewal benefits application on Healthcare.gov. In addition to offering voter registration, the question should inform customers that their decision to register to vote or not will not affect their benefits, and of their right to privacy while registering. The voter registration question should be incorporated into the application itself before the application is submitted and should be a mandatory (hard-stop) question. These steps will help to ensure that customers and assisters engage with, rather than skip over, the question. Moreover, the voter registration opportunity will be most effective if it is included in the initial application, before individuals engage with the insurance marketplace.

The NVRA and numerous state health exchanges provide very good models for the language to use. Based on these models, below is a specific proposal for recommended language:

If you are not registered to vote where you live now, would you like to apply to register to vote today? You should be registered to vote at your current address, and therefore, should submit a voter registration application to update your address if you are not sure if your voter registration is current. Yes and I would like to register to vote online. You will be redirected to Vote.gov once you have submitted your application. Through Vote.gov you will be able to access your state's online voter registration system. Please be aware that not all states have online voter registration systems and in most states, you must have a valid state driver's license or ID card to use the system. If you are concerned about using your state's online voter registration system, below you can request that a paper voter registration application be sent through the mail. Yes and I would like receive a voter registration application through the postal mail. Yes and I would like receive a voter registration application the same way I receive other letters from the Marketplace (email or through the postal mail). No (I am not interested in voter registration or not eligible to register to vote). Clicking yes does not register you to vote – you must fill out a voter registration application.

Applying to register or declining to register to vote will not affect the amount of assistance that you will be provided, or your eligibility. Your decision whether to register to vote will be kept confidential. You may fill out your voter registration application in private, and the information you provide on your voter registration application will not be shared with the Marketplace.

The voter registration application will provide the specific details about who is eligible to vote in your state <u>but be aware that in all states and the District of Columbia to register to vote in federal elections you must be a U.S. citizen.</u>

If you need assistance or have questions about the voter registration, you can call the MarketPlace Customer Service at 1-800-318-2596.

FFEs should provide customers with the same language assistance for this voter registration question and information as is provided for the Healthcare.gov benefits applications.⁵

II. <u>Distribute Voter Registration Forms Accessibly:</u>

All individuals who opt to register to vote must be provided access to a voter registration application to complete the voter registration process. There is no one option that all customers will be able to use and, therefore, different options for accessing a voter registration application should be provided. We recommend providing customers with different options when asking the voter registration question within the initial application, and then programming Healthcare.gov to follow through on the option selected once customers submit their application or renewal. The two-step process ensures that customers do not skip over the voter registration question but also that the process of providing access to a voter registration application does not disrupt the completion of the benefits application.⁶

Direct customers to Vote.gov:

If the customer selects to register to vote and to use online systems, we recommend that they be automatically redirected to Vote.gov after receiving their confirmation page, which we understand customers receive after they have successfully submitted their application or renewal. But given the different circumstances by which customers might be accessing Healthcare.gov, they should also be given options to change their preference before being redirected. Customers should be told on the confirmation page that, because they indicated that they wanted to register to vote online, they will be re-directed to Vote.gov. However, they should also be given an option to opt-out/avoid being redirected and given the option again to request a voter registration application through the mail. The redirection itself should not occur until after customers have had sufficient time to read the option to opt-out.

The following is potential language for the confirmation page:

⁵ The National Mail Voter Registration Form has been translated in 15 languages, which are available on the Election Assistance Commission's website. *National Mail Voter Registration Form*, U.S. ELECTION ASSISTANCE COMM'N, https://www.eac.gov/voters/national-mail-voter-registration-form (last visited July 14, 2021).

⁶ This is the ideal point for customers to complete voter registration because they do not move onto the next health benefits application step immediately, so it is not disruptive. Individuals who receive subsidies have not selected insurance plans yet—they need to receive their determination letter before they can do so. Additionally, if an individual qualifies for Medicaid, they are directed to their state Medicaid agencies. Providing access to voter registration during the initial application and renewal processes on Healthcare.gov ensures that all customers are provided the voter registration opportunity.

During your application or renewal, you indicated that you wanted to register to vote using an online voter registration system. Therefore, you will now be redirected to Vote.gov where that is possible. If you do not want to be redirected to Vote.gov, **please click here.**

If instead you want to receive a paper voter registration application through the mail, please click here.

If instead you want to receive a voter registration application the same way you receive other letters from the Marketplace (email or through the postal mail), **please click here**.

Vote.gov is maintained by the General Services Administration ("GSA").⁷ Vote.gov provides two options for accessing voter registration applications:

<u>First</u>, it provides easy access to all state online voter registration systems, and GSA takes responsibility for ensuring that the provided links are up to date. The majority of states have online voter registration systems, ⁸ which are often the most efficient way for individuals to register to vote. Providing access to Vote.gov is the easiest way for Healthcare.gov to provide access to state online voter registration systems to all customers throughout the country.

Second, Vote.gov also provides access to the National Mail Voter Registration Form ("NMVRF") for use in those states without online voter registration systems, or for those individuals who do not want to use, or cannot use, their state's online voter registration system. The NMVRF is a paper voter registration application that can be downloaded and used to register to vote in the vast majority of states. With very few exceptions, an individual can only use a state's online voter registration system if they have a driver's license or state ID card. Not all individuals have these types of identifications, particularly lower-income individuals and others who are often left off the voter rolls. Therefore, only offering access to a state's online voter

⁷ See https://vote.gov/ (last visited Nov. 1, 2021).

⁸ See Online Voter Registration, Nat'L Conference of State Legislatures, https://www.ncsl.org/research/elections-and-campaigns/electronic-or-online-voter-registration.aspx (last visited Nov. 1, 2021).

⁹ National Mail Voter Registration Form, U.S. ELECTION ASSISTANCE COMM'N, https://www.eac.gov/voters/national-mail-voter-registration-form (last visited Nov. 1, 2021).

¹⁰ See 52 U.S.C. § 20503, 20508. There are three exceptions: New Hampshire, North Dakota and Wyoming. See National Mail Voter Registration Form, General Instructions, U.S. ELECTION ASSISTANCE COMM'N, https://www.eac.gov/sites/default/files/eac assets/1/6/Federal Voter Registration ENG.pdf, (last visited Nov. 1, 2021).

¹¹ See supra n.9.

¹² For example, eleven percent of U.S. citizens do not have any form of government-issued photo identification. See Brennan Center for Justice, Citizens without Proof: A Survey of Americans' Possession of Documentary Proof of Citizenship and Photo Identification (New York: Brennan Center for Justice, 2006), available at

registration system will leave some individuals without any option to access a voter registration application they can actually use. The inclusion of NMVRF on Vote.gov provides many of these individuals another option to access a voter registration application they can use.

Providing access to Vote.gov would allow CMS to provide many of the users of Healthcare.gov with access to a usable voter registration application.¹³

Ensure customers can request a voter registration application be sent through the mail:

Some customers will not be able to use online voter registration and will not have easy access to a printer to use a downloadable .pdf of a voter registration application—including some people with disabilities, lower incomes, younger and older people, and other marginalized members of our society. Therefore, FFEs should also provide an option for customers to request that a voter registration application be sent through the mail.¹⁴ Offering an option to request a blank voter registration application in the mail is the only way to ensure that everybody is included in the voter registration opportunities that CMS provides through Healthcare.gov.

In addition to specifically requesting a voter registration application through the mail, customers should also be given a choice to receive a voter registration application the same way they receive materials from the exchange – either through the mail or through email. If a customer's communication selection is through the mail, a voter registration application could be included with other mailings. And if a customer's communication selection is email, a voter registration application can be included with other e-mails as an attachment that customers could download and print at their convenience.

In addition to the blank voter registration application, a voter registration mailing should include a cover letter providing customers key information, including:

- Notification that the mailing is from CMS.
- Basic information about who is eligible to register to vote, such as the requirement that individuals must be U.S. citizens to register to vote.

http://www.brennancenter.org/sites/default/files/legacy/d/download file 39242.pdf, at 1 (last visited Nov. 1, 2021).

¹³ Furthermore, under President Biden's March 7, 2021 Executive Order on Promoting Access to Voting, *available at* https://www.whitehouse.gov/briefing-room/presidential-actions/2021/03/07/executive-order-on-promoting-access-to-voting/, GSA is directed to improve the interface for the voter registration services provided on Vote.gov. We are advocating that these improvements for voter registration include: providing better language assistance; providing an option that is accessible to all individuals with disabilities; improving the overall usability of the interface; and improving the configuration so that it can be more easily used on a mobile device. *See* Comment on Federal Register Document #2021-12619 from the ACLU and Demos (Comment ID NIST-2021-0003-0147), *available at* https://www.regulations.gov/comment/NIST-2021-0003-0147.

¹⁴ In our comments, we have recommended that Vote.gov also provide individuals with the opportunity to request a voter registration application be mailed to them. *See id.* If this option were provided by Vote.gov, CMS might not have to also provide it.

 An explanation that individuals need to mail completed voter registration applications to election officials at the address provided on either the enclosed state voter registration application or NMVRF, as appropriate.¹⁵

This cover letter could be included with the voter registration application attachment for email transactions.

There are multiple options for ensuring adequate supply of paper voter registration applications:

- HHS and CMS should be able to easily access state voter registration applications, which are publicly available to be downloaded from most states' election websites.¹⁶
- In many states, election officials provide voter registration applications to state agencies covered by the NVRA on a regular basis and are likely to be willing to provide federal agencies with copies of their state voter registration applications, if requested. Some states even have systems for easily accessing application supplies.¹⁷
- CMS could send the National Mail Voter Registration Form. The modernization work that
 Vote.gov is required to do will hopefully include developing formats of the National Mail Voter
 Registration Form that are state specific and user friendly. Vote.gov could make those
 available to CMS upon request.

To minimize costs, voter registration applications could be sent with other CMS mailings, such as determination letters.

https://azsos.gov/sites/default/files/20200417_AZ_Voter_Registration_Form_Printable_0.pdf; Florida: https://www.myfloridaelections.com/Voting-Elections/Register-To-Vote#App; Kansas: https://www.kssos.org/forms/elections/voterregistration.pdf and Maryland: https://elections.maryland.gov/voter_registration/application.html.

¹⁵ The instructions for every state included with the National Mail Voter Registration Form provide the correct mailing address. *See National Mail Voter Registration Form*, U.S. Election Assistance Comm'n, https://www.eac.gov/voters/national-mail-voter-registration-form (last visited July 14, 2021). This information is also included with all state voter registration applications. *See infra* n.17.

¹⁶ See, e.g., Arizona:

¹⁷ For example, the Colorado Secretary of State has an online portal that allows agencies to request copies of blank paper voter registration forms. See https://www.sos.state.co.us/ccorner/NVRAAgencyOrderForms.do. With respect to providing a supply of hard copy forms, even state election officials who are not supportive of President Biden's Voting EO might be willing to provide assistance with access to state voter registration forms if requested. While almost all states are required to accept the NMVRF, see supra n.10, state election officials typically prefer that potential voters use state forms. Given this preference, they might provide state forms.

¹⁸ Currently the NMVRF provides instructions for all states, making it 27 pages long. *See National Mail Voter Registration Form, General Instructions*, U.S. ELECTION ASSISTANCE COMM'N, https://www.eac.gov/sites/default/files/eac assets/1/6/Federal Voter Registration ENG.pdf (last visited Nov. 1, 2021). Based on NMVRF work that Vote.gov might be doing, *see* Comment, *supra* n.13, CMS might be able to provide shorter versions of the NMVRF with only the relevant state instructions. CMS collects residential information for all customers and as such could send the correct state instructions.

Examples from state operated health insurance exchanges and other systems:

State operated health insurance exchanges provide good models for how voter registration services can be incorporated effectively into an exchange. The attached exhibits include strong examples from several states:

- **Exhibit A**: Voter registration page from California's health benefits exchange CalHeers online application.
 - CalHeers offers both the option to access the state's online voter registration system and to request a voter registration application through the mail.
- **Exhibit B**: Application page early in Washington's online health benefits portal, Healthplanfinder, which explains that individuals who indicate they would like to register to vote are sent to the Secretary of State's webpage.
 - Washington Secretary of State's voter registration landing page allows individuals to register to vote online, download a voter registration application, or request that a voter registration application be sent in the mail.¹⁹
- **Exhibit C**: Screenshots of the voter registration services provided through Arizona's Health-e-Arizona Plus online application portal, which offers access to voter registration through several options, including mail, email, text or whatever way individuals have chosen to communicate with HEAPlus.
- **Exhibit D:** A cover letter that North Carolina's Department of Health and Human Services sends to clients. This is a helpful model because
 - o It emphasizes that individuals must be U.S. citizens to register to vote;
 - Provides Spanish language assistance;
 - o Provides mailing instructions for returning completed forms; and
 - o Provides a contact number for further assistance.

III. Train Navigators and Customer Service Representatives to Assist Customers:

In accord with NVRA requirements, state agencies provide their clients with voter registration assistance, even when the interactions with clients are mostly through an online portal. The FFEs should follow the states' successful models and provide assistance with voter registration to their customers.

Assisters, both in-person Navigators and telephone Customer Service Representatives, should provide customers with voter registration assistance. To ensure these individuals provide high quality services, they should be trained to provide assistance with voter registration, just like they provide assistance with all the other components of the benefits application.

Training should include how to:

- Help customers access voter registration applications.
- Provide information about how to contact their state election officials:

¹⁹ See https://www.sos.wa.gov/elections/register.aspx.

- This contact information is available from the Election Assistance Commission and USA.gov.²⁰ Additionally, most state chief election officials, such as the Secretary of State, have toll-free telephone numbers for the public to ask questions.
- Answer basic questions about completing the voter registration applications.
- Explain where to mail or submit completed applications.²¹

A discussion about how to provide high quality voter registration assistance can be incorporated into the training that assisters already receive and can be modeled after existing trainings from states. Most state agencies provide annual training to staff who provide voter registration services and also include voter registration training as part of the onboarding for all new staff. Training staff to answer voter registration questions can be accomplished in about 30 minutes and should not be a significant burden.

Attached are sample materials used by state agencies to train staff in voter registration assistance:

- **Exhibit E**: Voter registration trainings from CalHeers for both in-person assisters and phone assisters.
- **Exhibit F:** A simple training guidance document that the California Secretary of State provides to state agency staff.

Section 2: Additional Policy Considerations

Following the above best practices for voter registration through Healthcare.gov will ensure robust access to voter registration opportunities but also will provide additional policy benefits. The recommended practices will also:

- I. Protect against registration of ineligible individuals
- II. Protect customers from undue pressure and agency staff from uncomfortable interactions
- III. Protect customers' confidentiality
- IV. Ensure all voter registration services are provided in a nonpartisan way
- V. Preserve the ultimate responsibility for voter registration with election officials

I. <u>Protect Against Registration of Ineligible Individuals</u>

The practices above will help to protect non-eligible individuals from inadvertently applying to register to vote in three important ways:

- Asking about voter registration in writing allows the agency to also provide information about the eligibility requirements, including the fact that to register to vote a person must be a U.S. citizen. Note:
 - o All state voter registration applications and the National Mail Voter Registration Form

²⁰ U.S. Election Assistance Commission, Election Day Contact Information, https://www.eac.gov/voters/election-day-contact-information (last visited Aug. 17, 2021); see also https://www.usa.gov/election-office.

²¹ As noted, the correct mailing addresses for election officials are provided as part of voter registration applications. *See supra* n.16 and n.17.

- list eligibility requirements.²²
- State departments of motor vehicles and public assistance agencies have been assisting clients with voter registration pursuant to the NVRA for over 20 years.
 Millions of American citizens have registered to vote through NVRA processes over that time,²³ and instances of non-eligible individuals registering through these agency transactions and then voting are vanishingly rare.
- Providing language assistance with voter registration services and voting information helps to
 ensure the individuals understand exactly what they are being asked about, and that they
 understand the specific eligibility requirements.
- Providing training to staff about the basic steps of voter registration and how customers can
 obtain assistance from election officials if they have complicated questions, including residency
 or restoration of rights concerns, also helps to protect customers because it gives them
 additional resources to help better understand questions about eligibility.
- Protect Customers from Undue Pressure and Agency Staff from Uncomfortable Interactions
 Providing the opportunity in writing, with additional information modeled after the NVRA-required language, helps to ensure that customers do not feel pressured to register to vote, which in turn ensures smooth interactions with agency staff or intermediaries. The NVRA requires that clients are clearly told that their decision to register to vote will not affect their benefits, and that if they want to register to vote, they can do so in private. Following this model helps ensure that clients do not feel pressured to register to vote.

III. Protect Customer Confidentiality

Training ensures staff understand they are required to keep confidential any information they learn while assisting clients with voter registration and/or handling completed voter registration applications for submission to election officials.

IV. Ensure All Voter Registration Services are Provided in a Nonpartisan Way

Robust and regular training helps to ensure Assisters understand that any discussions about voting and voter registration must be strictly nonpartisan, understand what it means to be nonpartisan, and understand that they should not influence the choice of their customers to register to vote or to pick the political party of their choice. State departments of motor vehicles and public assistance agencies that provide assistance to their clients with voter registration pursuant to the NVRA are nonpartisan government entities and successfully train their staff to remain non-partisan while providing these services.

V. Preserve the Ultimate Responsibility for Voter Registration with Election Officials

While the federal healthcare exchange can and should play an important role in improving access to voter registration services, HHS and CMS providing their customers with the opportunity to fill out a voter registration application does not represent the full process or responsibility of registering individuals to vote. Individual customers, not agency staff, must voluntarily complete the voter

9

²² See supra n.16 and n.17.

²³ See NVRA Reports to Congress, https://www.eac.gov/research-and-data/studies-and-reports.

²⁴ 52 U.S.C. § 20506(a)(6)(B).

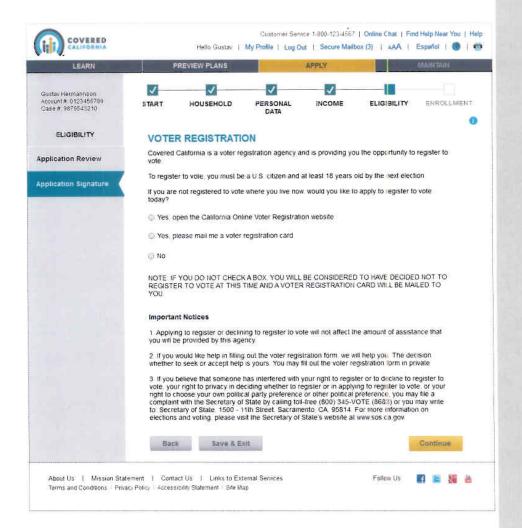
registration application, and affirm their eligibility to register to vote directly for themselves through the voter registration process. The ultimate responsibility for registering voters rests with election officials, who evaluate individuals' eligibility to register to vote and actually register voters after they receive completed applications. State agencies have been facilitating access to voter registration opportunities for clients since the NVRA went into effect in 1995 and have not been responsible for any inadvertent mistakes that occasionally occur.

Exhibit A

California

Voter registration page from California's health benefit exchange CalHeers online application

Voter Registration Page in CalHEERS Online Application



9/2/2014

16

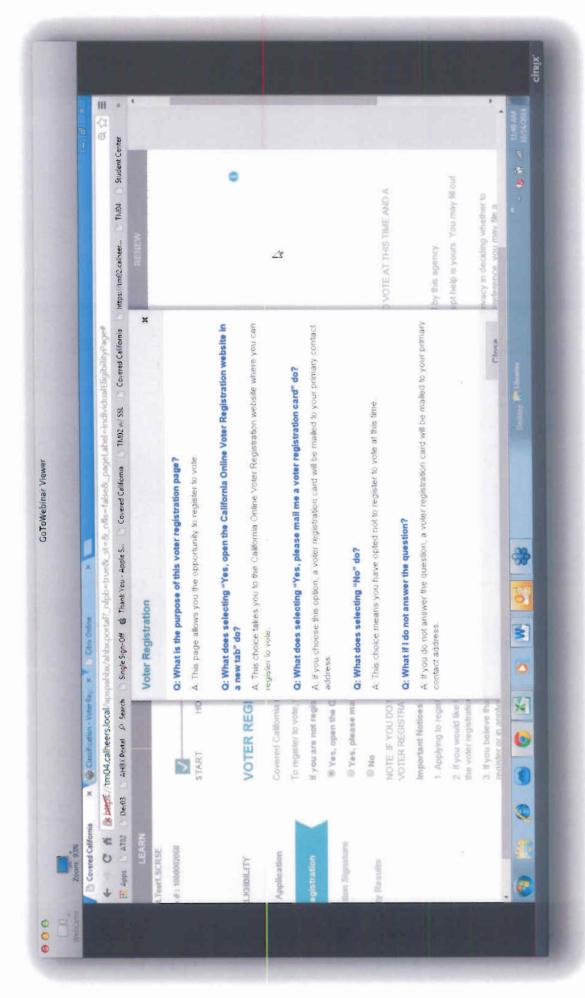
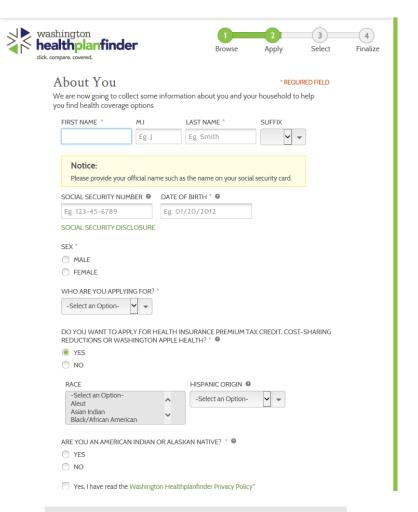


Exhibit B

Washington

Washington's online health benefits application portal, Healthplanfinder, showing the voter registration information is provided within the application



Voter Registration

IF YOU ARE NOT REGISTERED TO VOTE WHERE YOU LIVE NOW, WOULD YOU LIKE TO APPLY TO REGISTER TO VOTE? $\,^*$

O YES •

If you click "Yes" you will be able to register online or request a registration form to be sent to you.

Applying to register or declining to register to vote will not affect the amount of assistance that you will be provided, or your eligibility.

If you would like help in filling out the voter registration application, you can receive assistance at Washington's toll free Voter Registration Hotline, 1-800-448-4881. The decision whether to seek or accept help is yours. You may fill out the application in private.

If you believe that someone has interfered with your right to register or to decline to register to vote, or your right to privacy in deciding whether to register, you may file a complaint with the Washington State Elections Division, PO Box 40229, Olympia, WA 98504, email elections@sos.wa.gov, or call 1-800-448-4881.

If user selects "Yes," the SOS website is provided in a <u>separate</u> internet browser window.

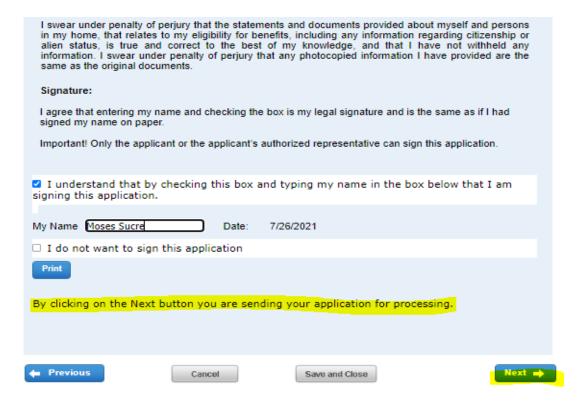


Exhibit C

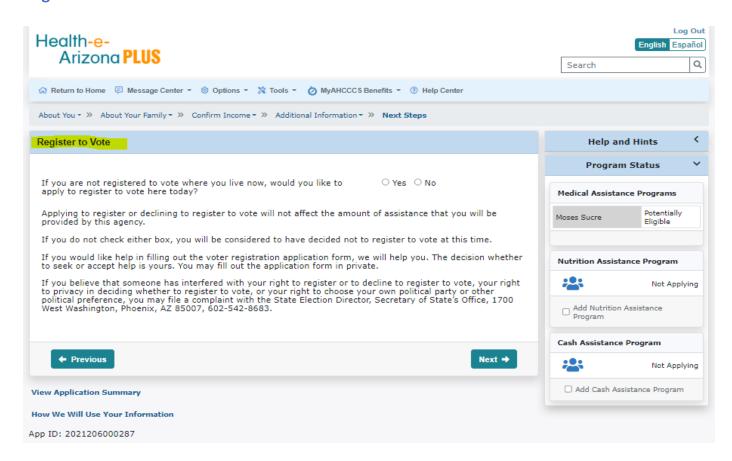
Arizona

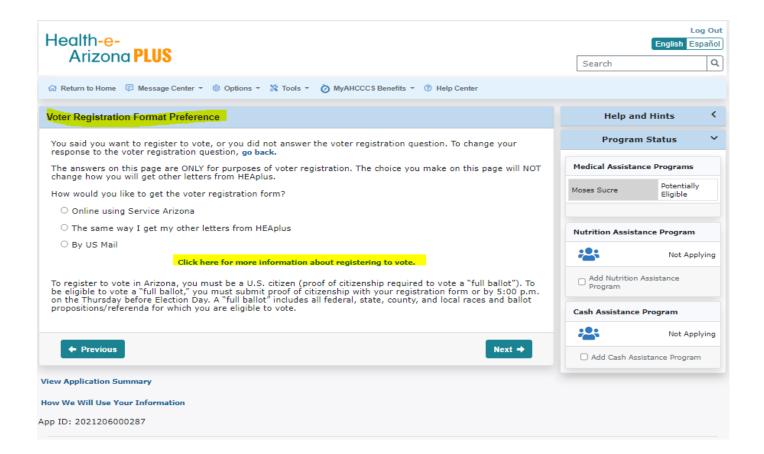
Arizona's Health-e-Arizona Plus online application portal, showing that communication about voter registration is offered through email, text, or whichever way individuals have selected to communicate with the agency

3.8- Customer Profile- 2021206000287- Voter Registration page



After Submitting the application, the customer will be navigated to the Voter Registration Page







ARIZONA DEPARTMENT OF ECONOMIC SECURITY (DES) ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM (AHCCCS)

Information About Registering to Vote

We are sending you the attached Voter Registration Application to ensure that you receive an opportunity to register to vote or update your registration address. You must be a U.S. citizen to register to vote. You are receiving this notice because you recently interacted with a state agency such as the Department of Economic Security (DES), Arizona Health Care Cost Containment System (AHCCCS), and/or the Health-e-Arizona Plus web portal.

If you are not registered to vote where you live now, and you want to vote in the upcoming election, you must return or mail this application to one of the locations described below by the deadline. To find the deadline for the next upcoming election:

- Go online to www.Arizona.Vote: or
- Call: 1-877-THE-VOTE or 602-542-8683.

NOTE: These phone numbers are for voter registration and voting information ONLY. These phone numbers cannot help with AHCCCS or DES eligibility. For help with AHCCCS or DES eligibility, call 1-855-HEAPLUS (1-855-432-7587).

Even though you are receiving this letter, you may not be eligible to register and vote. Please carefully read the instructions on the enclosed Voter Registration Application about registering to vote, eligibility to register to vote and proof of citizenship requirements.

To register to vote or update your registration address, please complete and mail the enclosed Voter Registration Application. After you return your application, you should receive a voter registration card in the mail within 4-6 weeks.

Completed voter registration applications can be returned:

By mailing to:

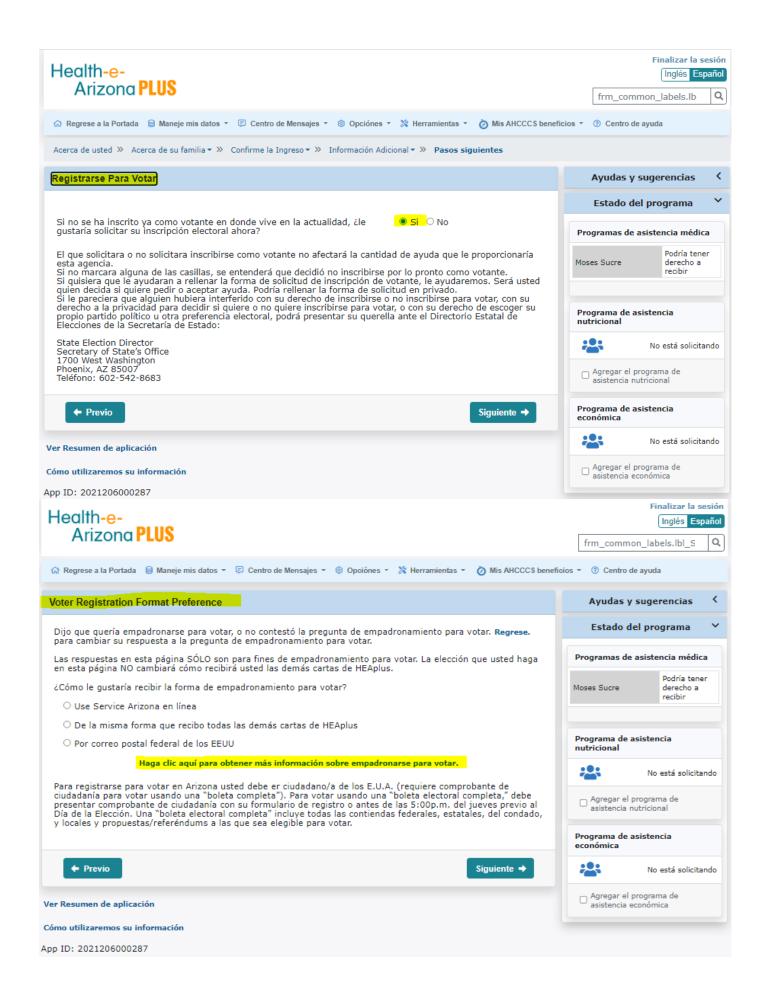
- Office of the Secretary of State Elections Division 1700 W Washington St Fl 7 Phoenix AZ 85007-2808
- The County Recorder for the County where you live. County Recorder addresses can be found at https://azsos.gov/county-election-info.

In person:

 By taking it to your local DES or AHCCCS office. Workers at any DES or AHCCCS office will help you register to vote or help update your voter registration address.

If you have an Arizona driver's license or State ID card issued since October 1, 1996 you can also register to vote online at: servicearizona.com/VoterRegistration/selectLanguage. You can check your voter registration status at: www.Arizona.Vote.

Applying to register or declining to register to vote will not affect the amount of assistance that you will be provided, or your eligibility for assistance. If you would like help filling out the voter registration form, need more voter registration forms, or have any questions, you can call 1-877-THE VOTE (843-8683). This phone number is for voter registration information ONLY. This phone number cannot help with AHCCCS or DES eligibility. For help with AHCCCS or DES eligibility, call 1-855-HEAPLUS (1-855-432-7587).



Información sobre empadronamiento para votar

Le enviamos la forma adjunta de empadronamiento (inscripción) para votar (Voter Registration Application) para votar por correo para asegurarnos de que reciba una oportunidad de empadronarse para votar y/o para actualizar su domicilio actual. Deberá ser ciudadano/a de los Estados Unidos para votar. Recibirá este aviso porque recientemente interactuó con una agencia estatal, tal como el Departamento de Seguridad Económica (DES), el plan de salud Arizona Health Care Cost Containment System (AHCCCS), y/o el portal Web de Health-e-Arizona Plus.

Si no está empadronado(a) en donde vive actualmente, y quisiera votar en las elecciones venideras, debe regresar o enviar por correo para la fecha límite esta solicitud a uno de los lugares a continuación. Para buscar la fecha límite de la próxima elección:

- Vaya en el internet a www.Arizona.Vote; o
- Llame al: 1-877-THE-VOTE o 602-542-8683.

NOTA: Estos teléfonos solo le servirán para información de registro de votantes y información de empadronamiento electoral. Estos teléfonos no le servirán para ayudarle con su elegibilidad de AHCCCS o DES. Para ayuda con su elegibilidad de AHCCCS o DES, llame 1-855-HEAPLUS (1-855-432-7587).

Aunque haya recibido esta carta, puede que no sea elegible para empadronarse y votar. Por favor, lea cuidadosamente las instrucciones en la Solicitud adjunta de Empadronamiento Para Votar sobre empadronamiento para votar, elegibilidad para empadronarse para votar y comprobantes de ciudadanía requeridos.

Si quisiera empadronarse para votar o actualizar su domicilio inscrito para votar, por favor, rellene la Solicitud de Empadronamiento adjunta y envíela por correo. Después de que haya enviado de vuelta su solicitud, deberá recibir por correo una tarjeta comprobante de empadronamiento en plazo de 4 a 6 semanas.

Podrá entregar o enviar de vuelta la solicitud de empadronamiento rellenada a:

Por correo a

- Office of the Secretary of State Elections Division 1700 W Washington St Fl 7 Phoenix AZ 85007-2808
- La Oficina del Registro del Condado (County Recorder) del condado en el que usted viva.
 Podrá conseguir los domicilios de los Registros de Condados mediante https://azsos.gov/county-election-info.

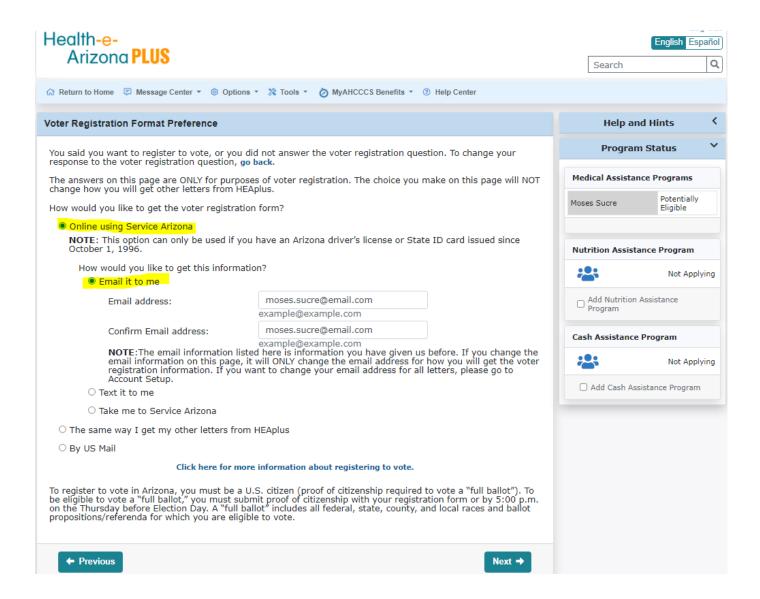
En persona:

 Entréguela a su oficina más cercana del DES o de AHCCCS. Los empleados de cualquier oficina del Departamento DES o del Programa AHCCCS le ayudarán a empadronarse para votar o a actualizar su domicilio para fines electorales.

Si tuviera licencia de manejar o credencial de identificación de Arizona expedidas desde el 1 de octubre del 1996, también podrá empadronarse en línea por Internet mediante: servicearizona.com/VoterRegistration/selectLanguage. También podrá verificar su empadronamiento para votar mediante: www.Arizona.Vote.

El que solicite o se rehúse a solicitar empadronamiento para votar no afectará el monto de la asistencia que se le proporcionará, ni su elegibilidad para la asistencia. Si quisiera que le ayudaran a rellenar la forma de empadronamiento para votar, necesitara más formas de empadronamiento, o tuviera dudas o preguntas, podrá llamar a 1-877-THE VOTE (843-8683). Este teléfono SÓLO le servirá para información de empadronamiento electoral. Este teléfono no le servirá para ayudarle con su elegibilidad de AHCCCS o DES. Para ayuda con su elegibilidad de AHCCCS o DES, llame 1-855-HEAPLUS (1-855-432-7587).

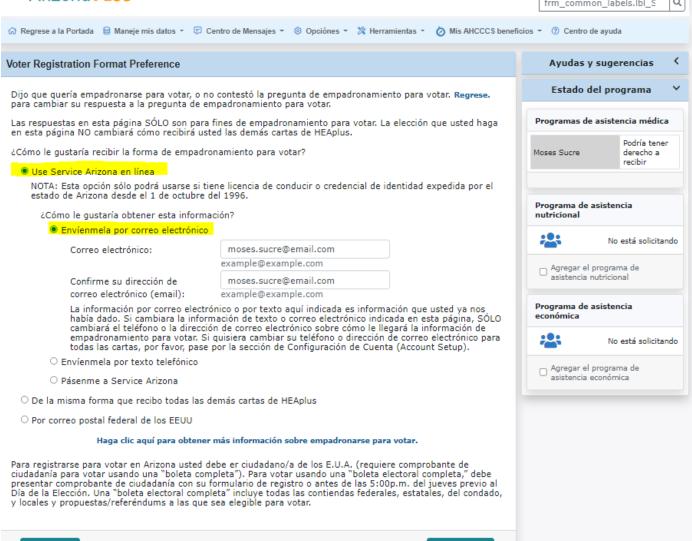
3.9a- Customer Profile- 2021206000287- Online Services





← Previo





Siguiente →

Receive Using Service Arizona Website

Continue

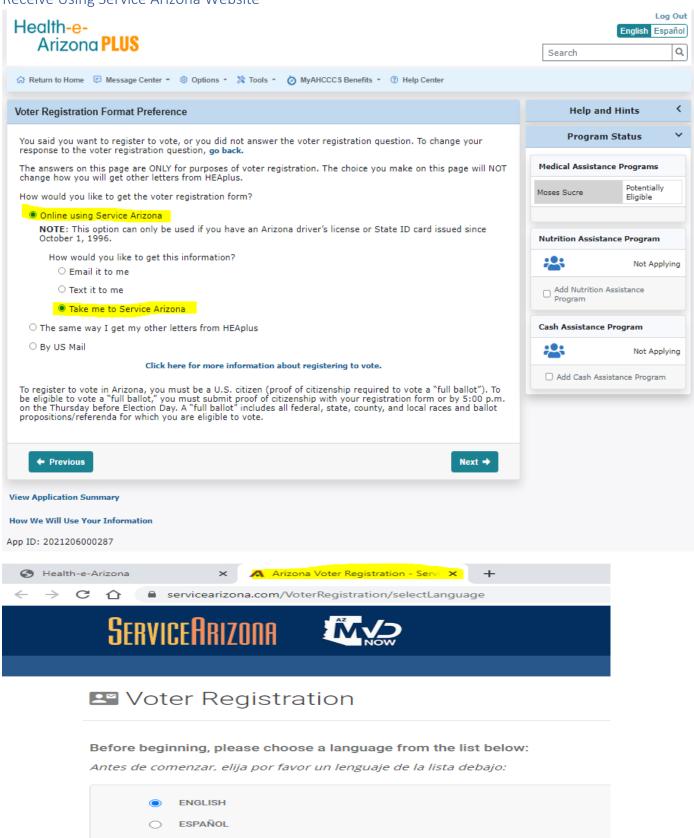


Exhibit D

North Carolina

North Carolina Department of Health and Human Services cover letter sent to clients emphasizing individuals must be U.S. citizens to register to vote (and providing Spanish language assistance)





P.O. Box 27255 Raleigh, NC 27611-7255 Mailing Address Dirección Postal

elections.sboe@ncsbe.gov E-mail Correo electrónico 919) 814-0700 *or* (866) 522-4723 **Phone Teléfono**

(919) 715-0135 **Fax**

Notice of Voter Registration Services

You are receiving this letter because of your recent interaction with a county DSS office. The National Voter Registration Act requires the county DSS office to provide the client with an opportunity to register to vote. During your interaction with the county DSS office, you may have indicated that you would like to register to vote at the address at which you currently live. Enclosed is a voter registration application. Once completed, you may send the form directly to the State Board of Elections at the address provided on the back of the voter registration form or you may return it to your local county DSS office. Only U.S. citizens are eligible to register to vote. You must meet all the qualifications listed at the top of the enclosed voter registration application and in the signature block of the application. If you do not meet these qualifications, do not return the enclosed application. If you wish to be registered to vote, please complete and sign the enclosed form confirming, under penalty of perjury, that you meet the qualifications to vote and that the information on the application is correct. Please contact the State Board of Elections at 1-866-522-4723 if you desire assistance in completing the application or if you have questions concerning this notice. If you would prefer a copy of the enclosed voter registration form in Spanish, please visit https://www.ncsbe.gov/NVRA/01. You may also call 1-866-522-4723.

Aviso de Servicios de Inscripción del Votante

Usted está recibiendo esta carta debido a su reciente interacción con una oficina de la División de Servicios Sociales (DSS) del condado. La Ley Nacional de Inscripción de Votantes requiere que la oficina de DSS proporcione al cliente la oportunidad de inscribirse para votar. Durante su interacción con la oficina de DSS del condado, es posible que haya indicado que le gustaría inscribirse para votar en la dirección en la que actualmente vive. Adjunto encontrará una solicitud de inscripción para votar. Una vez la haya completado, puede enviarla directamente a la Junta Estatal de Elecciones a la dirección proporcionada en la parte de posterior del formulario o puede devolverla a su oficina local de DSS del condado. Solamente los ciudadanos estadounidenses son elegibles para inscribirse para votar. Usted debe cumplir con todos los requisitos enumerados en la parte superior de la solicitud de inscripción para votar adjunta y en el bloque de la firma de la solicitud. Si usted no cumple con estos requisitos, no devuelva la solicitud. Si desea inscribirse para votar, por favor complete y firme la solicitud adjunta confirmando, bajo pena de perjurio, que cumple con los requisitos para votar y que la información en la solicitud es correcta. Por favor póngase en contacto con la Junta Estatal de Elecciones al 1-866-522-4723 si desea asistencia para completar la solicitud o si tiene preguntas relacionadas con este aviso. Si prefiere una copia de la solicitud de inscripción para votar adjunta en español, por favor visite https://www.ncsbe.gov/NVRA/01 o también puede llamar al 1-866-522-4723.

NCSBOE 2019.03

Exhibit E

California

Voter registration trainings from CalHeers for both in-person assisters and phone assisters



IN-PERSON ASSISTER PROCEDURE TASK GUIDE: VOTER REGISTRATION

Function	Protocol for in-person assisters to provide voter registration assistance
Task Group	
Process	Voter Registration
Identifier	
Job Roles	In person assisters include: Navigators, Certified Enrollment Counselors(CEC), Certified Insurance Agents
Background	Under Federal and State law, Covered California must offer consumers voter registration services each time a person seeks service or assistance with: 1) An application 2) A renewal or reenrollment of their application 3) Change of address If a consumer seeks help for one of the above reasons, the assister must offer help with voter registration to the same degree as is offered with Covered California's form unless assistance is declined. The assister must make the consumer aware they can also register in private, if they so choose.

Situation	Description
Situation 1	Assister is providing in person assistance through the internet which involves the consumer submitting an application, a renewal, or a change of address.
	When the application comes to the voter registration preferences section, the assister will ask the consumer if he/she wants to register to vote today and read aloud or allow the applicant to read the "Important Notices" section of the voter preference form.
	According to the answer, the assister will check the appropriate box in the application and take the corresponding action:
What should the Assister do?	 Consumer answers "Yes" (Assister follows the link to online voter registration and selects the registration form in consumer's preferred language if it is offered. The consumer must be informed that he/she has the right to register to vote in private, and that answers to the online voter registration form may be filled out in private.

	 2) Consumer answers "No" (Assister takes no other action.) 3) Consumers answers "Yes, mail me forms" (Consumer will be mailed a voter registration packet, in their preferred language, from Covered California. Assister takes no other action.)
Situation 2	Assister is providing in person assistance through paper, which involves the consumer submitting an application, a renewal, or a change of address. When the application comes to the voter registration preferences section, the assister will ask the consumer if he/she wants to register to vote today and read aloud or allow the applicant to read the "Important Notices" section of the voter preference form.
	According to the answer, the assister will check the appropriate box in the application and take the corresponding action:
What should the assister do?	 Consumer answers "Yes" (If there is computer access, assister goes to http://registertovote.ca.gov, and selects the registration form in the consumer's preferred language if it is offered. The consumer must be informed that he/she has the right to register to vote in private, and that answers to the online voter registration form may be filled out in private. Consumer answers "No" (Assister takes no other action.) Consumers answers "Yes, mail me forms" (Consumer will be mailed a voter registration packet in preferred language, from Covered California once their application is keyed in. Assister takes no other action.)
Situation 3	Assister is working with a consumer for any reason other than to submit an application, renewal, or change of address but the consumer specifically asks about voter registration options through Covered California.
What should the Assister do?	Explain to the consumer (or potential consumer) that: Covered California is a voter registration agency and we offer applicants for health insurance the opportunity to

	register to vote. The decision of whether or not to register will not affect the ability to obtain health insurance or financial aid. To learn more or register, visit "RegisterToVote.ca.gov", call (800) 345-VOTE (8683), or go in person to county elections office. Language help: Numbers for voter registration help in other languages can be found here: http://www.sos.ca.gov/elections/new-voter/voter-assistance-hotlines.htm
Situation 4	Assister is working with a consumer for any reason other than to submit an application, renewal, or change of address and consumer does not ask about voter registration.
What should the Assister do?	Assister need not discuss voter registration with the consumer, unless other job related requirements outside of Covered California's training call upon them to do so.

FAQs

What if the consumer wants to report a problem about a voter registration experience through Covered California?

Say: "If you believe that someone has interfered with your right to register or to decline to register to vote, your right to privacy in deciding whether to register or i applying to register to vote, or your right to choose your own political party preference or other political preference, you may file a complaint with the Secretary of State by calling toll-free (800) 345-VOTE (8683) or you may write to: Secretary of State, 1500 - 11th Street, Sacramento, CA, 95814. For more information on elections and voting, please visit the Secretary of State's website at www.sos.ca.gov."

What if the consumer does not have a driver license, a state-issued ID, or Social Security number?

The assister will inform the consumer that he/she may still register to vote as long as he/she meets the other eligibility requirements. The consumer should leave those fields blank in the voter registration form.

What if a consumer asks about a political party?

Do not discuss political parties with the consumer. If a consumer does not wish to register

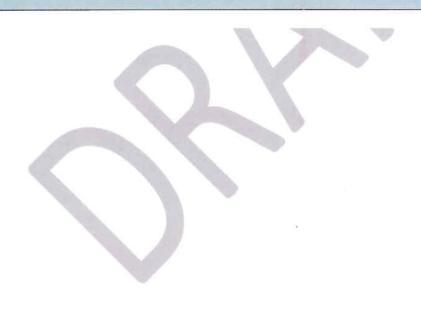
with a party, the consumer should choose "No, I do not want to disclose a political party preference."

What are some situations when a consumer may want to register to vote?

- Never registered to vote
- · Moved to a new address
- Changed his/her name
- · Changed political party preference
- · Not sure if he/she is registered to vote
- · Has not voted in the last several elections.

What if the consumer has other questions I can't answer?

Call the county elections office for assistance at the phone numbers listed here: http://www.sos.ca.gov/elections/elections_d.htm, or refer to the (attached) NVRA FAQ from the Secretary of State.





PHONE SERVICE TASK GUIDE: VOTER REGISTRATION

Function	Protocol for phone assisters when offering voter registration services.
Task Group	
Process	Voter Registration
Identifier	
Job Roles	Phone assisters include: Service Center Representatives (SCR), Navigators, Agents, and Certified Enrollment Counselors.
Background	Under Federal and State law, Covered California must offer consumers voter registration services each time a person seeks service or assistance with their application, a renewal or reenrollment of their application, or change of address.

Description	Protocol Steps
Situation 1	Consumer seeks assistance over the phone that involves submission of an application, an application renewal, or a change of address. In this case, the consumer will be mailed a voter registration packet, in their preferred language, from Covered California.
What should the Assister do?	When the assister is editing the consumer application and comes to the CalHEERS voter registration page, the SCR will click "Yes, Mail the forms". The consumer's household will be mailed a voter registration package from Covered California, which includes a Voter Registration Card and a letter with additional information on how to register to vote.
Situation 2	Consumer calls and specifically asks about voter registration options through Covered California.
What should the Assister do?	Covered California is a voter registration agency and Covered California offers applicants for health insurance the opportunity to register to vote. For more information the consumer can visit https://www.coveredca.com/resources/voter-registration/ .

7/3/2014 1

Situation 3	Assister is working with a consumer for any reason other than to submit an application, renewal, or change of address and consumer does not ask about voter registration.
What should the Assister do?	Assister does not discuss voter registration with the consumer.
Situation 4	Consumer calls in to report a problem about a voter registration experience through Covered California.
What should the PBE do?	Say: "If you believe that someone has interfered with your right to register or to decline to register to vote, your right to privacy in deciding whether to register or in applying to register to vote, or your right to choose your own political party preference or other political preference, you may file a complaint with the Secretary of State by calling toll-free (800) 345-VOTE (8683) or you may write to: Secretary of State, 1500 - 11th Street, Sacramento, CA, 95814. For more information on elections and voting, please visit the Secretary of State's website at www.sos.ca.gov."



Exhibit F

California

Training guidance document that the California Secretary of State provides to state agency staff

BASICS FOR DESIGNATED VOTER REGISTRATION AGENCIES

The National Voter Registration Act (NVRA) is a federal law requiring designated agencies to provide "voter registration services." This handout provides general information and guidance about this law to agency staff.

Requirements

The NVRA requires agency staff to provide "voter registration services" every time a client:

- · Applies for benefits or services,
- · Renews or recertifies benefits or services, or
- Requests a change of address

What does "voter registration services" mean?

- Provide the Voter Preference Form. The Voter Preference Form asks clients if they would like to register to vote and makes clear that their benefits and services will not be affected by their answer. Completed Voter Preference Forms must remain on file in your office for two years.
- Provide the Voter Registration Card (VRC). Instructions for completing a VRC can be found on page 2.
- Help the client register to vote, unless the client declines to register. Provide the same level of assistance you would provide with your agency's own forms.
- Accept completed VRCs and forward them to the county elections office. VRCs are pre-addressed and postage paid and should be forwarded daily.

Reminders

- Offer voter registration for all required transactions whether they occur in person or by mail, phone, or online.
- For clients between the ages of 16 and 17, you may offer them a VRC to fill out in order to pre-register to vote.
- When the client is a minor (under 16), provide voter registration to the adult applying on behalf of the child.
- The federal Voting Rights Act requires election materials to be available in Spanish and English in all California counties. Check with your county elections office on additional languages that may be required.
- Do not screen applicants for eligibility to vote or discourage voter registration. County elections officials carefully verify eligibility before a voter is placed on the rolls.
- Encourage applicants to register, but do **not**, **in any way**, discuss or influence their political party preference.

Additional Information

- People with disabilities may initially decline to register to vote because they are unsure about how they
 may cast a ballot on Election Day. In California, each polling place has at least one accessible voting
 machine. Voters also have the option of voting by mail. Counties have remote accessible vote-by-mail
 (RAVBM) systems allowing voters with disabilities to receive their ballots at home and mark them
 independently and privately before sending them back to elections officials.
- People do not need to be able to read, write, or speak English in order to register to vote.
- People may not remember if they are registered to vote and can visit <u>www.voterstatus.sos.ca.gov</u> to check their status. When in doubt, a voter can re-register! There is no penalty for re-registering.

For additional information, please visit: http://www.sos.ca.gov/elections/voter-registration/nvra/training/.

BASICS FOR COMPLETING VOTER REGISTRATION CARDS (VRCs)

Item 1: Voter declaration. The applicant must mark "yes" or "no" to the question of whether or not they are a United States citizen and if they will be 18 years old on or before Election Day. To pre-register to vote in California, the applicant must mark the box indicating that they are 16 or 17 years old and otherwise meet the eligibility requirements to vote.

Item 2: First name, middle name (or initial), last name, suffix (optional), and title (optional).

• Should match CA driver license (CDL)/CA identification card (ID Card).

Item 3: Date of birth and CA driver license/ID card number or last four of Social Security Number.

- Date of birth and U.S. state or foreign country (not county) of birth.
- If the applicant has been issued a CA driver license or an identification card, they MUST list the number.
- If the applicant does not have either, they MUST list the last 4 digits of their Social Security Number.
- If the applicant does not have any of the above, they can still register to vote. Just leave the field blank.

Item 4: Home address, city, zip code, and county name. This should be their "Residential" address.

- Residence: Place in which the applicant's habitation is fixed and where the intention is to stay. For voting purposes, a person can have only ONE residence.
- P.O. Boxes & business addresses are NOT valid here.
- If the applicant does not have a street address, they should enter an exact description of where they live.
 - Cross streets, route, box, bridges, or other landmarks can be used.
 - Mostly used for applicants living in rural areas with non-specific street addresses. Also used for applicants who are homeless.

Item 5: Mailing address. The applicant must complete this section if they want to receive election mail at an address other than their residence. This can be a P.O. Box or business address.

Item 6: The applicant should complete this section if they were previously registered and changed their address, surname, or political party preference. If the applicant cannot recall their previous address, it can be left blank.

Item 7: To become a permanent vote-by-mail voter, the applicant must check the box marked "yes." This can be left blank if the applicant wants to vote at a polling location.

Item 8: Political party preference. Mark box to choose any of the political parties listed. If the applicant does not want to choose a political party preference, mark the "No Party/None" box.

• There can be only ONE mark in Item 8 with NO CORRECTIONS or ALTERATIONS. A new VRC must be filled out if an error is made.

Item 9: Optional Information

- E-mail address and phone number. These are optional but recommended.
- To receive state materials in another language, mark the language preference box. If no box is checked, voter materials will be provided in English.

Item 10: This item MUST contain the signature/mark/signature stamp of the applicant. Please also include the date of signing.

Blue Box: Complete this box if you filled out (put pen to paper) some or all of the VRC on behalf of the applicant. If you only answered questions or checked if the VRC was complete, do not complete the box.